

1 **JAMES R. GREINER, ESQ.**
CALIFORNIA STATE BAR NUMBER 123357
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5 ATTORNEY FOR DEFENDANT
6 BLANCHE PATRICIA HASSALL

7
8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,)	CR.-S-05-128-LKK
)	
11 PLAINTIFF,)	MOTION AND REQUEST FOR THE COURT
)	TO FIND THE CASE COMPLEX AND TO
12 v.)	EXCLUDE TIME UNDER THE SPEEDY
)	TRIAL ACT PROVISIONS AND
13 BLANCHE PATRICIA HASSALL,)	ORDER
)	
14 DEFENDANT.)	
)	
15)	

16 The defendant, BLANCHE PATRICIA HASSALL, by and through her counsel, James R.
17 Greiner, requests and moves this Court to find that this case is complex and that the speedy trial
18 clock should be stopped and time excluded therefrom until the next status conference scheduled for
19 Wednesday, September 7, 2005, pursuant to Title 18 section 3161(h)(8)(A) and (B)(ii).

20 The case is complex based upon both the number of defendants in the case, 7 defendants to
21 date with one defendant outstanding, and the amount of discovery the government represents is in this
22 case. The government stated that approximately 2,000 to 3,000 pages of discovery would be produced
23 in the next week or so, and that the government has approximately over 10 four drawer file cabinets
24 full of discovery and over approximately 25 banker boxes of documents (it is actually closer to 17
25 four drawer file cabinets and 65 banker boxes). The sheer amount of discovery will take a substantial
26 amount of time for counsel to review and to review with my client to adequately represent her. Thus,
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1 the defendant requests that the speedy trial clock be stopped and under the above provisions and also
2 under local code T-4.

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4 DATED: JULY 20, 2005

LAW OFFICES OF JAMES R. GREINER

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6 /s/ JAMES R. GREINER

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8 ATTORNEY FOR DEFENDANT
9 BLANCHE PATRICIA HASSALL

10
11 **GOOD CAUSE BEING SHOWN,**
12 **IT IS SO ORDERED.**

13 DATED: July 21, 2005

14 /s/ Lawrence K. Karlton
15 HONORABLE LAWRENCE K. KARLTON
16 Senior District Court Judge
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